

# Exhibit 3

UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF WYOMING

STEPHANIE WADSWORTH, )  
individually and as Parent )  
and legal guardian of ww, KW)  
GW and LW, minor children of)  
MATTHEW WADSWORTH, )

Plaintiffs, )

vs. )

) Case No.

) 2:23-cv-00118-NDF

WALMART, INC., and JETSON )  
ELECTRIC BIKES, LLC )

Defendants, )

DEPOSITION OF BILL ROBINSON

Wednesday, November 15, 2023, 1:00 P.M.

Via Zoom video conference

BE IT REMEMBERED that the  
deposition of BILL ROBINSON was taken by the attorney for  
the Plaintiffs, GRAYSON GOODY, ESQ., 58 Malaga Cove Plaza,  
Palos Verdes Estates, California 90274 before Christine J.  
Roybal, Court Reporter for the State of Idaho, in the  
above-entitled matter.

1 Q. Okay. Did he arrive before or after you?

2 A. After.

3 Q. Do you know how long after you?

4 A. I don't.

5 If he was there before me, I don't recall if he was or  
6 not.

7 Q. And he would have come in a private vehicle?

8 A. He would have been in a personal vehicle.

9 Q. Looking at what we see as the fire at about  
10 10 minutes 30 seconds into this video, is that consistent of  
11 what you would have seen when you arrived?

12 A. I don't recall.

13 Q. In your investigations do you realize --

14 (Court reporter clarification.)

15 Q (By MR. LAFLAMME) In your fire investigation do  
16 you utilize NFPA921?

17 A. You'd have to refresh me what NFPA291 is.

18 Q. NFPA29 is the guide for fire and explosion  
19 investigations.

20 A. We try to.

21 Q. And are you familiar with that guide?

22 A. Not without looking at it.

23 Q. I believe you had -- I want to take a little step  
24 back and just go over some of the background items again.

25 You had indicated that you started with City of Green River

1 Q. And with all of your education, your training,  
2 your experience, do you agree that you're capable of  
3 investigating fires and making a determination as to origin?

4 A. Correct.

5 Q. And where the evidence supports it you're  
6 certainly capable based on background, training, and  
7 experience, in making a determination as to causation?

8 MR. LAFLAMME: Object to form.

9 A. I try not to determine causation on behalf of the  
10 Green River Fire Department just, it's not something I want  
11 to practice, so.

12 Q (By MR. AYALA) Fair enough. So you leave that,  
13 typically you leave that either to the Fire Marshal or you  
14 leave that to detectives like Sheman?

15 A. Yeah, I refer to the jurisdiction, I have no  
16 authority for it.

17 Q. Fair enough. Based on all of the evidence  
18 provided to you and that existed, did you employ your best  
19 efforts at determining the origin of this fire?

20 A. Absolutely.

21 Q. Using all that education, background, training,  
22 and experience you have and have accumulated over the years.

23 A. Yes, I believe everyone deserves 100 percent  
24 effort.

25 Q. Okay. You were asked questions about whether or

1 not you formed any other hypothesis, other than the fact  
2 that the fire originated in the bedroom, do you remember  
3 that question?

4 A. I do.

5 Q. Prior to forming a hypothesis, which by the way as  
6 we all learn in science class way back when, a hypothesis is  
7 an educated guess, isn't it?

8 A. More or less.

9 Q. And you use facts and evidence together, this  
10 educated guess or opinion?

11 A. Agreed.

12 Q. So prior to putting together a hypothesis, you  
13 have to collect some facts, you have to collect some  
14 evidence, do you agree?

15 A. I agree.

16 Q. And so in your investigation of this fire, you  
17 collected facts, didn't you?

18 A. I did.

19 Q. You collect evidence, didn't you?

20 A. And based upon your collection of facts and  
21 evidence was there any other educated opinion that you could  
22 reasonably come to other than the fact that this fire  
23 originated in that bedroom?

24 MR. LAFLAMME: Object to form.

25 A. No.